July 8, 2022

Brady Walker
Head of Government Affairs and Strategy
Orsted Maryland & Delaware
One Park Place, Suite 400
Annapolis, MD 21401

Mike Dunmyer
Delaware Development Manager
US Wind
401 East Pratt Street, Suite 1810
Baltimore, MD 21202

Re: Proposed windfarms off North Bethany associated with an estimated 20-year $2.8 billion purchase obligation awarded by the Public Service Commission of Maryland. Orsted was awarded an estimated $1.4 billion contract in 2017 and U.S. Wind was awarded a $1.4 billion contract in 2017.

Thank you for your joint video presentation to North Bethany on 7/7/2022. The almost 90 participants that participated in your join presentation come from 25 different homeowners' associations in North Bethany that represent 1,280 homeowners that are directly impacted by your proposals. As you prepare for the follow-up video meeting on Tuesday July 12th, there are safety, operational hazard risks and misrepresentation issues that need to be researched and addressed.

Safety and Operational Hazard Risks:

The National Oceanic and Atmospheric Administration (NOAA) has designated North Bethany as above average risk for hurricanes. NOAA's outlook for the 2022 Atlantic hurricane season, which extends from June 1 to November 30, predicts a 65% chance of an above-normal hurricane season. This is the seventh consecutive year where NOAA is predicting an above-average hurricane season. In May, North Bethany experienced one of the most destructive Northeasters since the Storm of the Century in 1962.

Operator & Developer Hurricane Risk Experience:

1. How many Orstead and U.S. Wind windfarms are built in hurricane zones? Of the 30 Orstead offshore windfarms how many have sustained hurricane damage?
2. Assuming a direct hit from a hurricane or a northeaster would the devastation be compounded by a loss of power due to the proposed windfarms?
3. Do Orstead or U.S. Wind have insurance for storm risk? Separately, are their parent company guarantees from Ørsted A/S? Skipjack Offshore Energy, LLC was formed in 2016 and is wholly owned by another Delaware LLC formed in 2009, which is in turn an indirect subsidiary of Ørsted A/S. Does U.S. Wind have parent company guarantees? U.S. Wind, headquartered in Baltimore, was established in 2011. U.S. Wind, Inc. is a subsidiary of Italian-based Renexia Wind Offshore SpA (80% owner of the U.S. Wind subsidiary), part of Toto Holding SpA, also an Italian company. An additional ownership company in the U.S. Wind project is AIOF II NJord Co-Invest, LP, which is managed by Apollo Global Management.
4. Ørsted A/S is a publicly traded company on the NASDAQ Nordic exchange (ticker ORSTED). What are Orsted's Securities and Exchange Commission (SEC) disclosures related to climate change that pertain to this project?

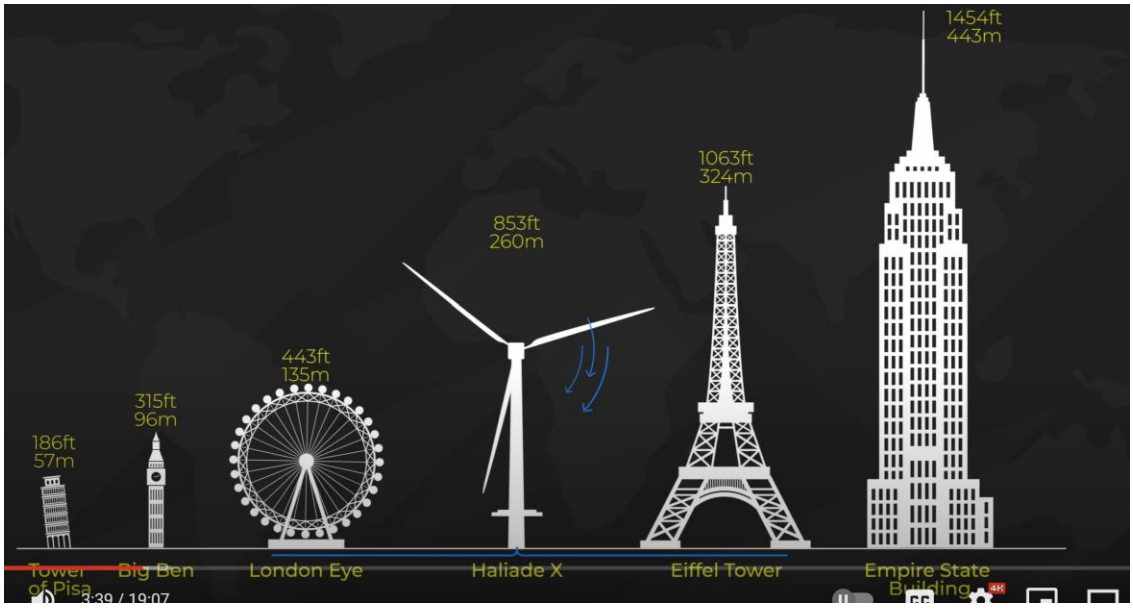
Operator & Developer Oil Spill Risk Experience:

1. How many Orstead and U.S. Wind offshore windfarms have had vessel collisions and/or sinkings? The proposed windfarms are adjacent to major shipping lanes. How many vessel collisions and/or sinkings have resulted in hull breach and direct uncontrolled discharge of diesel, gasoline or bunker fuel due to navigation errors, engine failure, or weather events? When an uncontrolled fuel spill pollutes the North Bethany beaches what is Orsted's and U.S. Winds' responsibility to mitigate and pay for the cleanup?

Misrepresentations In The 84th Street Line of Site Video:

The video and narrative provided had multiple inaccuracies that must be corrected, so public representations and representations to regulators are accurate.

1. It was stated lights will not be required per the Federal Aviation Administration (FAA). This is not true. The FAA requires navigation beacons on all towers over 200 feet.
2. It was stated the wind towers will not be illuminated. This is not true. The U.S. Coast Guard requires navigation beacons on windfarm towers to operate and illuminate separately from FAA navigation beacons that provide 360 degree visibility.
3. Horn navigation systems may be required by the U.S. Coast Guard, which need to be added to the audible decimal profile of the proposed windfarms.
4. Your video showed a line of site view from 84th Street in Ocean City, Maryland without incorporating a 15 foot ground level elevation adjustment, or a 5 foot eye line of sight adjustment. The video presented only one version of the windfarm towers being proposed. The height of the 930 foot windfarm tower is 14% higher than the 817 foot windfarm tower. The 20 foot local elevation adjustment means the windfarm towers are at least 15% bigger than in the visual rendering provided. The General Electric's Haliade-X offshore turbines are massive. They have a height profile just 12.6% less than the Eiffel Tower in Paris.



The video needs to accurately factor in the curvature of the earth:

Visible from 35.157 miles = 1.23 * (square root of 817 foot windfarm tower)
Visible from 37.509 miles = 1.23 * (square root of 930 foot windfarm tower)

Calculations based on the radius of the earth approximately 3,965 miles. Using the Pythagorean theorem, that calculates to an average curvature of 7.98 inches per mile. The distance to the horizon in miles from height of an observer is approximately equal to 1.23 times the square root of the height in feet.

Lease Rights Swap and Needed Environmental Studies:

Have Orstead and U.S. Wind considered swapping lease rights? You are currently bidding on lease rights further offshore. The additional distance would reduce the impact on endangered and vulnerable species. Horseshoe crabs, dolphins, sea turtles and whales use electromagnetic navigation. There is a significant lack of research on the impact of the electromagnetic fields that marine animals use as life sustaining sensory input. It is also not understood how the electromagnetic fields generated by the web of undersee cables will impact marine animals. Horseshoe crabs play a critical role in toxicity testing for vaccines, flu shots, injectable drugs and medical devices, which are all tested using horseshoe crab blood that primarily comes from the Delaware Bay.

Developing the windfarms further offshore would help save endangered migratory birds and Monarch butterflies. Endangered fin, minke and sperm whale populations would benefit from uninterrupted access to coastal feeding grounds. In addition, offshore navigation hazards for coastal barges would be reduced as well. An understudied option is landfall in Maryland. Why is a Maryland backed project worth nearly $3 billion project not making landfall in Maryland? Delaying in shore windfarm development would provide time for needed studies and research to ensure your actions save nature rather than destroy it, while preserving the most important regional economic engine – tourism and the visual appeal of the Delaware beaches.

Orstead Block Island farm with 300’ towers which are 1/3 the size of the proposed towers

Sincerely,

Niall H. O'Malley

Niall H. O'Malley
North Bethany

Sources:
https://www.noaa.gov/news-release/noaa-predicts-above-normal-2022-atlantic-hurricane-season
https://www.evwind.es/2021/12/19/orsted-awarded-846-mw-offshore-wind-power-contract-in-maryland/83860
https://energy.maryland.gov/Pages/Info/renewable/offshorewind.aspx
https://www.psc.state.md.us/wp-content/uploads/Order-No.-90011-Case-No.-9666-Order-Granting-Offshore-Wind-Renewable-Energy-Credits.pdf
https://energy.maryland.gov/Documents/PSC-Order-No-88192-CaseNo9431.pdf
https://orstedcdn.azureedge.net/-/media/www/docs/corp/us/skipjack/sjw_faq_april_2020.ashx?la=en&rev=ace27e9d93c544bd8daa8658e54ea142&hash=3CEDE2155932861B22D82977E234DB2E
https://www.boem.gov/sites/default/files/documents/renewable-energy/state-activities/Maryland%20Offshore%20Wind%20Overview_MEA%20Presentation.pdf
https://orsted.com/en/company-announcement-list/2021/12/2021121745911
https://via.ritzau.dk/ir-files/13560592/4591/5988/Skipjack%202%20CA.pdf